

1 SEAN P. FLYNN (SBN: 15408)  
2 **GORDON REES SCULLY MANSUKHANI**  
3 1 Liberty Street, Suite 424  
4 Reno, NV 89501  
5 Telephone: (775) 467-2610  
6 Email: sflynn@grsm.com

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8 Attorneys for Defendant  
9 ALLIED COLLECTION SERVICES, INC.

10  
11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 DEREK LAND,

14 Plaintiff,

15 vs.

16 ALLIED COLLECTION SERVICES, INC.;  
17 EXPERIAN INFORMATION SOLUTIONS,  
18 INC.' EQUIFAX INFORMATION  
19 SERVICES, LLC; and TRANS UNION LLC,

20 Defendant.

CASE NO. 2:22-cv-01641-APG-EJY

21 **JOINT MOTION FOR EXTENSION OF**  
22 **TIME TO FILE OPPOSITION TO**  
23 **PLAINTIFF'S ATTORNEY FEE MOTION**  
24 **(FIRST REQUEST)**

1 Defendant Allied Collection Services, Inc. (“Defendant”) pursuant to LR IA 6-1, with  
2 the stipulated consent of, Plaintiff Derek Land (“Plaintiff”), respectfully move the Court for an  
3 Order Extending Time for Defendant to file its Opposition to Plaintiff’s Motion for Attorney  
4 Fees [Dkt. # 72]. This is Defendant’s first request for an extension of time relative to  
5 Plaintiff’s Motion. Defendant further states the following in support of this request:

- 6 1. On August 19, 2024, the Court entered an Order setting the deadline for plaintiff to file  
7 his motion for attorney’s fees and costs as September 11, 2024.
- 8 2. That same day, the court set Defendant’s deadline to file its opposition as October 9,  
9 2024.
- 10 3. On September 11, 2024, Plaintiff filed his Motion for Attorneys Fees. [Dkt. 72.]
- 11 4. At the time of the August 19, 2024 hearing, Defense Counsel failed to identify that its  
12 opposition deadline fell in the middle of a preplanned family vacation.
- 13 5. On October 3, 2024, Defense Counsel reached out to Plaintiff’s Counsel regarding the  
14 instant Joint Motion to Extend Time and requested until October 18 to file its  
15 Opposition.
- 16 6. On October 4, 2024, Plaintiff’s Counsel responded that it did not object to Defendant’s  
17 Opposition deadline being extended to October 18.

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Reno, NV 89501

7. There is no reply deadline, and no hearing scheduled, that would be impacted by the requested extension of time.

For the reasons stated and for good cause shown, Defendant and Plaintiff respectfully request entry of an Order allowing Defendant to file Its opposition to Plaintiff's Motion for Attorney's Fees and Costs on or before October 18, 2024.

Dated: October 4, 2024

**GORDON REES SCULLY MANSUKHANI**

By: s/ Sean P. Flynn  
Sean P. Flynn (SBN 15408)  
Attorneys for Defendant  
ALLIED COLLECTION SERVICES,  
INC.

**CONSUMER ATTORNEYS**

DATED: October 4, 2024

By: s/ Michael Yancey  
Tarek N. Chami – (MI # P76407)  
Admitted Pro Hac Vice Only  
22000 Michigan Ave, Suite 200  
Dearborn, MI 48124  
Phone: 313-444-5029  
tchami@consumerattorneys.com

Michael Yancey III, NV # 16158  
CONSUMER ATTORNEYS  
5940 S Rainbow Blvd, Suite 3014  
Las Vegas, NV 89118  
P: (480) 573-9272  
F: (718) 715-1750  
E: myancey@consumerattorneys.com

*Attorneys for Plaintiff,  
Derek Land*

IT IS SO ORDERED.

  
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U.S. MAGISTRATE JUDGE

Date: October 7, 2024

**Gordon Rees Scully Mansukhani, LLP**  
1 East Liberty Street, Suite 424  
Reno, NV 89501